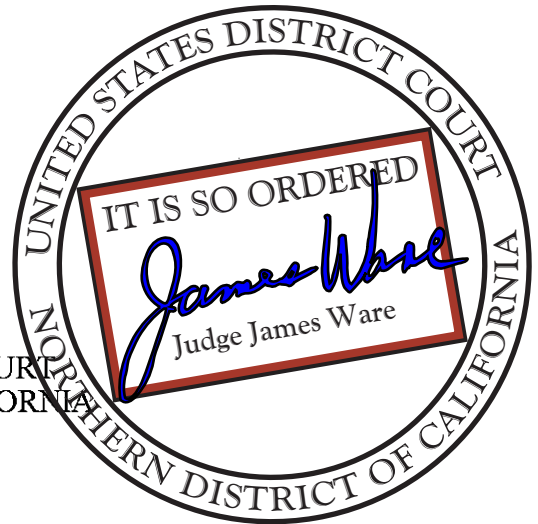


James McManis, State Bar No. 40958
Michael Reedy, State Bar No. 161002
MCMANIS FAULKNER
50 W. San Fernando St., Tenth Floor
San Jose, CA 95113
Telephone: (408) 279-8700
Telecopy: (408) 279-3244
jmcmanis@mcmanislaw.com; mreedy@mcmanislaw.com

Attorneys for the Plaintiffs
[Additional counsel appear on signature page]

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA



SARAH PEREZ;
MICHELLE LACKNEY;
RACHEL STEWART;
RACHEL HARDYCK,
on behalf of themselves and all others
similarly situated,

Plaintiffs,

v.

STATE FARM MUTUAL AUTOMOBILE
INS. CO., an Illinois corporation;
ALLSTATE INDEMNITY CO., an Illinois
corporation;
GEICO GENERAL INSURANCE CO.,
a Maryland corporation;
CERTIFIED AUTOMOTIVE PARTS ASS=N.,
a Delaware corporation
LIBERTY MUTUAL FIRE INS CO.,
a Massachusetts corporation; and
UN-NAMED INSURANCE CONSPIRATORS

Defendants.

CASE NO. CO6-1962 (JW) (PSG)

**STIPULATION AND ORDER
AS TO CONFIDENTIALITY
OF DATA PRODUCED BY
CCC INFORMATION
SERVICES, INC. AND
MITCHELL INTERNATIONAL,
INC.**

1 Herein the Parties seek a stipulation as to the confidentiality of certain third-party discovery
2 and show the Court as follows:

3 1. In May of 2011, Plaintiffs served document subpoenas under the authority of the
4 United States District Court for the Northern District of Illinois and the United States District Court
5 for the Southern District of California on CCC Information Services, Inc. ("CCC") and Mitchell
6 International Inc. ("Mitchell"), respectively, seeking data as to repair-parts usage in part for purposes
7 of modeling alleged class-wide antitrust pricing injury for asserted members of the proposed State
8 Farm and GEICO Classes.
9

10 2. After receipt of Doc. 581 Plaintiffs negotiated independently with CCC and Mitchell
11 to limit the production at this time to that they believe needed to support the class certification
12 motion and as limited by the Court's Order of November 29, 2011.
13

14 3. CCC and Mitchell have asked that the parties treat all data respectively produced by
15 CCC or Mitchell as "Highly Confidential/Outside Counsel Only" under Paragraphs 1.4 *et seq.* of the
16 Protective Order in this matter (Docket No. 376) and the Parties concur.
17

18 4. By making the production, the Parties also stipulate that neither CCC nor Mitchell
19 International are subjecting themselves to the jurisdiction of this Court for purposes of the
20 enforcement of the subpoenas or otherwise.
21

22 IT IS SO STIPULATED ON DECEMBER 14, 2011.
23
24
25
26
27
28

By //s//
On Behalf of All Plaintiffs

James McManis
Michael Reedy
McManis Faulkner
50 W. San Fernando St.
San Jose, CA 95113
Telephone: (408) 279-8700
jmcmanis@mcmanislawlaw.com
mreedy@mcmanislaw.com

Colleen Duffy-Smith
Morgan Duffy-Smith & Tidalgo LLP
1960 The Alameda, Suite 220
San Jose CA 95126
Telephone: (408) 244-4570
cduffysmith@mdstlaw.com

R. Stephen Berry
(D.C. Bar No. 234815)
Berry Law PLLC
1717 Pennsylvania Ave., NW
Suite 450
Washington, DC 20006
Telephone: (202) 296-3020
sberry@berrylawpllc.com

Steven F. Benz
D.C. Bar No. 428026
Andrew Hetherington
D.C. Bar No. 490434
Kellogg, Huber, Hansen, Todd, Evans,
& Figel, PLLC
1615 M Street, NW, Suite 400
Washington, DC 20036
Telephone: (202) 326-7900
sbenz@khhte.com
ahetherington@khhte.com

ATTORNEYS FOR PLAINTIFFS

By //s//
On Behalf of All Defendants

Richard L. Fenton
SNR Denton US LLP
233 S. Wacker Drive, Suite 7800
Chicago, IL 60606
Telephone: (312) 876-8000
richard.fenton@snrdenton.com

Steven H. Frankel
Bonnie Lau
SNR Denton US LLP
525 Market Street, 26th Floor
San Francisco, CA 94105
steven.frankel@snrdenton.com
bonnie.lau@snrdenton.com

ATTORNEYS FOR DEFENDANT
ALLSTATE INDEMNITY COMPANY

Raoul Kennedy
Richard J. Zuromski, Jr.
Skadden, Arps, Slate, Meagher & Flom LLP
525 University Avenue
Palo Alto, CA 94301
Telephone: (650) 470-4500
raoul.kennedy@skadden.com
richard.zuromski@skadden.com

ATTORNEYS FOR DEFENDANT
STATE FARM MUTUAL AUTOMOBILE
INSURANCE COMPANY

1 Sheila Carmody
2 Ian Fischer
3 Snell & Wilmer
4 One Arizona Center
5 Phoenix, AZ 85004
6 Telephone: (602) 382-6268
7 scarmody@swlaw.com
8 ifischer@swlaw.com

9
10 ATTORNEYS FOR DEFENDANT GEICO
11 GENERAL INSURANCE COMPANY
12

13 Michael P. Kenny
14 Cari Dawson
15 Erica Ghali
16 Alston & Bird
17 One Atlantic Center
18 1201 W. Peachtree Street
19 Atlanta, GA 30309
20 Telephone: (404) 881-7179
21 mkenny@alston.com
22 cdawson@alston.com

23
24 ATTORNEYS FOR DEFENDANT
25 CERTIFIED AUTOMOTIVE PARTS
26 ASSOCIATION

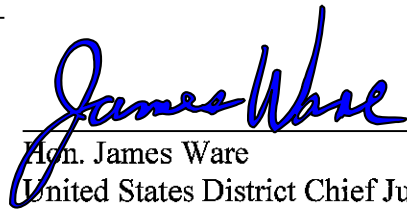
27 Carol A. Rutter
28 Mark G. Arnold
Husch Blackwell LLP
190 Carondelet Plaza, Suite 6090
St. Louis, MO 63105
Telephone: (314) 480-1500
carol.rutter@husch.com
mark.arnold@husch.com

ATTORNEYS FOR DEFENDANT
LIBERTY MUTUAL FIRE INSURANCE
COMPANY

ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: December 15, 2011 _____



Hon. James Ware
United States District Chief Judge